BEFORE THE

PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAII

DOCKET NO. 2006-0386

PUBLIC UTILITIES

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In the Matter of the Application of

HAWAIIAN ELECTRIC COMPANY, INC.

For Approval of Rate Increases and Revised Rate Schedules and Rules

DEPARTMENT OF DEFENSE'S THIRD

SET OF INFORMATION REQUESTS

TO HAWAIIAN ELECTRIC COMPANY, INC.

AND

CERTIFICATE OF SERVICE

RANDALL Y.K. YOUNG Associate Counsel (Code 09C) Naval Facilities Engineering Command, Pacific 258 Makalapa Drive, Suite 100 Pearl Harbor, HI 96860-3134 Telephone (808) 472-1195

ATTORNEY FOR DEPARTMENT OF DEFENSE

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF HAWAII

In the Matter of the Application of	_)	
HAWAIIAN ELECTRIC COMPANY, INC.)	DOCKET NO. 2006-0386
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Revised Rate Schedules and Rules)	
)	

DEPARTMENT OF DEFENSE'S THIRD SET OF INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC.

COMES NOW, DEPARTMENT OF DEFENSE ("Applicant") by and through its undersigned attorney and hereby submits its Third Set of Information Requests to Hawaiian Electric Company, Inc. ("HECO").

DATED: Honolulu, Hawaii, May 25, 2007.

RANDALL Y.K. YOUNG

Associate Counsel (Code 09C)

Naval Facilities Engineering Command, Pacific

258 Makalapa Drive, Suite 100

Pearl Harbor, HI 96860-3134

Telephone (808) 472-1195

ATTORNEY FOR DEPARTMENT OF DEFENSE

DOCKET NO. 2006-0386

DEPARTMENT OF DEFENSE'S THIRD

SET OF INFORMATION REQUESTS

TO HAWAIIAN ELECTRIC COMPANY, INC.

INSTRUCTIONS

In order to expedite and facilitate Department of Defense's review and analysis in the above matter, the following is requested:

- For each response, HECO should identify the person who is responsible for preparing the
 response as well as the witness who will be responsible for sponsoring the response should there
 be an evidentiary hearing;
- 2. Unless otherwise specifically requested, for applicable schedules or workpapers, HECO should provide hard copies of each schedule or workpaper together with one copy of each such schedule or workpaper on electronic media in a mutually agreeable format (e.g., Excel and Quattro Pro, to name two examples); and
- 3. When an information request makes reference to specific documentation used by HECO to support its response, it is not intended that the response be limited to just the specific document referenced in the request. The response should include any non-privileged memoranda, internal or external studies, assumptions, HECO instructions, or any other relevant authoritative source which HECO used.
- 4. Should HECO claim that any information is not discoverable for any reason:
 - a. State all claimed privileges and objections to disclosure;
 - b. State all facts and reasons supporting each claimed privilege and objection;
 - c. State under what conditions HECO is willing to permit disclosure to Department of Defense (e.g., protective agreement, review at business offices, etc.); and

- d. If HECO claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 4(a-c), identify each document or electronic file, or portions thereof, that HECO claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).
- 5. Please provide each response in electronic format (if available) as well as paper. Please provide two copies of each response, with one copy going directly via overnight delivery to DOD at the following address:

Dr. Khojasteh Davoodi, P.E.
EFACHES
Utility Rates and Studies Office
1322 Patterson Avenue, S.E.
Building 33, Floor 3, Room/Cube 33-3002
Washington, D.C. 20374
E-mail: Khojasteh.Davoodi@navy.mil

Ph. (202) 685-3319 Fax: (202) 433-7159

and one copy going directly via overnight delivery to DOD's consultant at the following address:

Maurice Brubaker
Brubaker & Associates, Inc.
P.O. Box 412000
1215 Fern Ridge Parkway, Suite 208
St. Louis, MO 63141-2000
E-mail: mbrubaker@consultbai.com
Ph. (314) 275-7007

DEPARTMENT OF DEFENSE'S THIRD SET OF INFORMATION REQUESTS

TO HAWAIIAN ELECTRIC COMPANY, INC.

DOCKET NO. 2006-0386

The following information requests are directed to HECO.

DOD-77	Referring to the Embedded Cost of Service Study in HECO-WP-2001, pages 1 through 161, please provide an electronic copy in Microsoft® Excel format, with all formulas intact, including all cost of service studies and all functionalization, classification, allocation and unitization at present rates, proposed rates and at equal rates of return.
DOD-78	Referring to HECO-WP-2001, page 83 of 161, please provide workpapers showing the calculation of the Average Excess Demand (D1) allocation factor.
DOD-79 .	Within the P-DP customer group in the cost of service study, please provide the number of customers, non-coincident customer demand and kilowatthours (or an estimate of each) associated with customers who receive service at the primary voltage level, but from the low side of a HECO-owned single customer substation that is fed from the HECO transmission system. Also provide the revenues under present rates and under proposed rates associated with such customers.
DOD-80	Referring to the Estimate of Test Year Revenues in HECO-WP-2016, please provide an electronic copy in Microsoft® Excel format, with all formulas intact.
DOD-81	Referring to HECO T-1, page 10, please provide a copy of the Adequacy of Supply report filed on March 6, 2006. Also, please provide all subsequent reports.
DOD-82	Please provide all regular monthly and all other filings with the Commission, by month, for the period January 2004 through the most recent filing for the Energy Cost Adjustment.
DOD-83	Referring to the Energy Cost Adjustment Clause, as proposed, please provide the supporting detail for the proposed new base costs for fuel and purchased power, including the cost of each individual source in each category, the percentage weighting of each source in each category, and the workpapers showing quantities, cost per unit prices, and the weighted

average values.

DOD-84

Please provide a copy of the NERA Report referenced at page 65 of HECO T-9.

CERTIFICATE OF SERVICE

I hereby certify that one copy of the foregoing <u>DEPARTMENT OF DEFENSE'S THIRD SET</u>

<u>OF INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC.</u> was duly served upon the following parties, by personal service, hand-delivery, and/or U.S. mail, postage prepaid, and properly addressed pursuant to HAR sec. 6-61-21(d).

William A. Bonnet Vice President, Government and Community Affairs Hawaiian Electric Company, Inc. P.O. Box 2750 Honolulu, Hawaii 96840-0001

Dean K. Matsuura
Director, Regulatory Affairs
Hawaiian Electric Company, Inc.
P.O. Box 2750
Honolulu, Hawaii 96840-0001

Thomas W. Williams, Jr., Esq. Peter Y. Kikuta, Esq. Goodsill Anderson Quinn & Stifel 1800 Alii Place 1099 Alakea Street Honolulu, Hawaii 96813

Department of Commerce and Consumer Affairs State of Hawaii Division of Consumer Advocacy 335 Merchant Street, Room 326 Honolulu, Hawaii 96813 2 Copies

DATED: Honolulu, Hawaii, May 25. 2007

RANDALL Y.K. YOUNG

Associate Counsel

Naval Facilities Engineering Command,

Pacific